



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

Office of the Regional Administrator

October XX, 2020

Robert Taylor, Director
Concerned Citizens of St. John Parish
Reserve, Louisiana
Sent via email: Robert Taylor <[[HYPERLINK "mailto:btcnola@gmail.com"](mailto:btcnola@gmail.com)]

Dear Mr. Taylor:

Thank you for your letter dated September 30, 2020, expressing your concerns regarding the US Environmental Protection Agency discontinuing the chloroprene community ambient air monitoring in Laplace, LA. As we publicly announced last February, the EPA concluded its community air monitoring in September 2020. The EPA has been and will continue to be committed to working with the community in St. John the Baptist as we fulfill our mission of protecting human health and the environment.

The Denka Performance Elastomer, LLC facility (Denka) has recently committed to continue their air monitoring efforts in the community through 2021 and they will share that data with the EPA and Louisiana Department of Environmental Quality (LDEQ), with the data being publicly available in LDEQ's Electronic Document Management System (EDMS). This week, the EPA announced over \$311,000 in funding to the state of Louisiana to advance their efforts to help the state determine health risks from toxic air pollutants in the community near the Denka Plant in St. John the Baptist Parish, LA. Also, under authorities outlined in the Clean Air Act, the EPA has continuing negotiations with Denka and DuPont regarding our ongoing enforcement action.

Chloroprene is one of the 187 pollutants that Congress classified as "hazardous air pollutants," also called air toxics. The Clean Air Act instructs the EPA to regulate air toxics by setting standards for listed source categories; rather than by setting ambient standards. Therefore, there is no federal ambient air quality standard for chloroprene in the air. The EPA has been working with the community on issues related to air contaminants for many years and had specifically been conducting ambient monitoring for chloroprene at six locations in the community of LaPlace since May 2016 (Community Ambient Air Monitoring Program). The goal of this monitoring effort was to gather longer term data about the ambient chloroprene levels in the LaPlace community, and we have met that goal. As part of this effort, we have collected over 2,500 measurements of the chloroprene concentrations in the community. Since March 2018, when Denka implemented chloroprene emission control measures, average concentrations indicate a significant reduction in the level of chloroprene and a downward trend at all monitoring sites. The final Community Ambient Air Monitoring samples were collected on September 26, 2020, and the EPA removed the Community Ambient Air Monitoring network after the last sample collection. monitoring analytical data has been posted to the public website at [[HYPERLINK "https://www.epa.gov/la/denka-air-monitoring-data-summary"](https://www.epa.gov/la/denka-air-monitoring-data-summary)].

The Continuous Air Monitoring Program was not designed as a replacement for the Community Ambient Air Monitoring or to measure long term ambient chloroprene levels. Rather, it is designed to

help the EPA understand the magnitude and frequency of occasional, but recurring, elevated chloroprene measurements or “spikes” that, as demonstrated by the Community Ambient Air Monitoring data, contribute significantly to the long-term chloroprene averages. Another objective of the Continuous Air Monitoring Program is to help identify unknown or under characterized emissions sources or activities at the facility. This continuous monitoring approach may help the EPA identify possible actions that Denka could take to further reduce chloroprene in the community.

The EPA began the Continuous Air Monitoring Program in March 2020. The Continuous Air Monitoring Program utilizes SPods to continuously measure concentrations of Volatile Organic Compounds (VOCs). Chloroprene is a VOC. When the VOC measurements exceed a threshold value (a trigger-level), a 24-hour average canister sample is collected and analyzed for chloroprene. The Initial Phase of the Continuous Air Monitoring Program helped the EPA identify and address instrument performance issues and modifications to the canister sample triggering methodology. The EPA is posting chloroprene sampling results from the Continuous Air Monitoring Program to the Denka Air Monitoring Data Summary Page: [[HYPERLINK "https://www.epa.gov/la/denka-air-monitoring-data-summary"](https://www.epa.gov/la/denka-air-monitoring-data-summary)]. The EPA will continue to evaluate the trigger method and trigger levels used to collect samples for the duration of the Continuous Air Monitoring Program.

I thank you for your shared interest in addressing the chloroprene levels in the community of LaPlace. The EPA continues to monitor the situation in the LaPlace community, and we are in regular communication with Denka. We have been encouraged by the overall results following emissions controls implemented by the company, leading to observed decreases in chloroprene concentrations in the neighborhoods, and we look forward to analyzing the data from the Continuous Air Monitoring system, and data provided by Denka.

Sincerely,

Ken McQueen
Regional Administrator

cc (by email):

The Honorable Cedric Richmond, Member of Congress, Louisiana, District 3 (via email to: [[HYPERLINK "https://gcc01.safelinks.protection.outlook.com/?url=https%3A%2F%2Frichmond.house.gov%2Fcontact-cedric%2Femail-me&data=02%7C01%7CDaniel.Neakeyla%40epa.gov%7C7d4381b8919740a614d508d86afc5555%7C88b378b367484867acf976aachbeca6a7%7C0%7C0%7C637376979275691767&sdata=x0EDVuy4r1QOSoNtdZf%2BtAIDQF%2FBUdgzKIKATgCbaJc%3D&reserved=0"](https://gcc01.safelinks.protection.outlook.com/?url=https%3A%2F%2Frichmond.house.gov%2Fcontact-cedric%2Femail-me&data=02%7C01%7CDaniel.Neakeyla%40epa.gov%7C7d4381b8919740a614d508d86afc5555%7C88b378b367484867acf976aachbeca6a7%7C0%7C0%7C637376979275691767&sdata=x0EDVuy4r1QOSoNtdZf%2BtAIDQF%2FBUdgzKIKATgCbaJc%3D&reserved=0)])

Jaclyn Hotard, President, St. John the Baptist Parish (via email to [[HYPERLINK "mailto:j.hotard@stjohn-la.gov"](mailto:j.hotard@stjohn-la.gov)])

Dr. Lynett Hookfin, Superintendent, St. John the Baptist Public School District (via email to: [HYPERLINK "https://gcc01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.stjohn.k12.la.us%2Fapps%2Fcontact%2F&data=02%7C01%7CDaniel.Neakeyla%40epa.gov%7C7d4381b8919740a614d508d86afc5555%7C88b378b367484867acf976aacbeca6a7%7C0%7C0%7C637376979275701736&sdata=uiM4%2FmLxK4UfeW%2F9Osbt54fpjG6o5buJL6zFaFyZ0hQ%3D&reserved=0"]

Dr. Chuck Carr Brown, Secretary Louisiana Department of Environmental Quality (via email to: [HYPERLINK "mailto:officesec@la.gov"])